

1 HARMEET K. DHILLON (SBN: 207873)
harmeet@dhillonlaw.com
2 MICHAEL A. COLUMBO (SBN: 271283)
mcolumbo@dhillonlaw.com
3 JEREMIAH D. GRAHAM (SBN: 313206)
jgraham@dhillonlaw.com
4 ANTHONY J. FUSARO, JR. (SBN: 345017)
afusaro@dhillonlaw.com
5 DHILLON LAW GROUP INC.
177 Post Street, Suite 700
6 San Francisco, California 94108
7 Telephone: (415) 433-1700
Facsimile: (415) 520-6593
8 *Counsel of Record for Plaintiff Republican National Committee*

9 THOMAS R. MCCARTHY*
tom@consovoymccarthy.com
10 THOMAS S. VASELIOU*
tvaselou@consovoymccarthy.com
11 CONOR D. WOODFIN*
conor@consovoymccarthy.com
12 CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Suite 700
13 Arlington, VA 22209
(703) 243-9423
14 *Counsel for Plaintiff Republican National Committee*
15 *Admitted *Pro Hac Vice*

16
17 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA
18 **SACRAMENTO DIVISION**

19 REPUBLICAN NATIONAL COMMITTEE,

20 Plaintiff,

21 v.

22 GOOGLE INC.

23 Defendant.
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25
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27
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Case Number: 2:22-CV-01904-JDP

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS AND
REQUEST FOR JUDICIAL
NOTICE**

1 Plaintiff Republican National Committee and Defendant Google LLC stipulate as follows:

2 1. Plaintiff filed its complaint on October 21, 2022, *see* Doc. 1;

3 2. Plaintiff served Defendant with its complaint on November 17, 2022, *see* Doc. 29;

4 3. Defendant's response to the complaint was initially due on December 8, 2022;

5 4. Finding good cause to extend Defendant's deadline to respond to Plaintiff's complaint,

6 on December 2, 2022, the Court granted Defendant a 45-day extension of time to respond to the

7 Complaint, *see* Doc. 14;

8 5. Defendant's response to Plaintiff's complaint was due on January 23, 2023;

9 6. On January 23, 2023, Defendant filed a motion to dismiss Plaintiff's complaint,

10 accompanied by a request for judicial notice and 15 exhibits;

11 7. Plaintiff's opposition brief is due February 6, 2023;

12 8. Defendant's reply brief is due February 16, 2023;

13 9. Good cause exists to grant the extension, so that Plaintiff and Defendant have time to

14 adequately address the arguments in the motion to dismiss and the request for judicial notice.

15 10. On January 30, 2023, after reviewing the arguments in the motion to dismiss and request

16 for judicial notice, Plaintiff's counsel reached out to Defendant's counsel to discuss an extension of the

17 briefing schedule for the motion to dismiss and the request for judicial notice;

18 11. Due to the numerous exhibits and arguments in the motion to dismiss and the request for

19 judicial notice, Plaintiff requests a 21-day extension to respond to the motion to dismiss and the request

20 for judicial notice, and Defendant requests an 18-day extension to file reply briefs;

21 12. The parties will suffer significant prejudice if the extensions are not granted because they

22 need sufficient time to address the numerous issues involved in this case;

23 13. The parties agree that neither party will suffer any prejudice if the Court grants the

24 requested extensions of time;

25 14. Defendant noticed a hearing on the motion scheduled for April 20, 2023, at 2:00 PM,

26 and the requested extensions will not affect the time or date of that hearing; and

27

28

1 15. The parties have extended one deadline in this case to permit Defendant 45 additional
2 days to respond to Plaintiff's complaint, and the parties do not believe that these additional extensions
3 will affect the progress of the case;

4 Therefore, the parties hereby stipulate as follows:

5 1. Plaintiff is granted a 21-day extension to respond to Defendant's motion to dismiss and
6 request for judicial notice;

7 2. Plaintiff's responses to Defendant's motion to dismiss and request for judicial notice are
8 due February 27, 2023;

9 3. Defendant is granted an 18-day extension to file reply briefs;

10 4. Defendant's reply briefs are due March 27, 2023.

11 **IT IS SO STIPULATED.**

12 Date: January 30, 2023 By: /s/ Michael A. Columbo

13 Harmeet K. Dhillon
14 Michael A. Columbo
15 Jeremiah D. Graham
16 Anthony J. Fusaro, Jr.
17 DHILLON LAW GROUP INC.
18 177 Post Street, Suite 700
19 San Francisco, California 94108
20 (415) 433-1700
21 *Counsel of Record for the Republican National Committee*

22 Thomas R. McCarthy*
23 Thomas S. Vaseliou*†
24 Conor D. Woodfin*‡
25 CONSOVOY MCCARTHY PLLC
26 1600 Wilson Blvd., Suite 700
27 Arlington, VA 22209
28 (703) 243-9423
 Counsel for Republican National Committee

* Admitted *Pro Hac Vice*
† Admitted in Texas. Supervised by
principals of the firm.
‡ Admitted in the District of Columbia.
Supervised by principals of the firm.

26 Date: January 30, 2023 By: /s/ Sunita Bali

27 Sunita Bali, Bar No. 274108
28 PERKINS COIE LLP
 Attorney for Google LLC

ATTESTATION

Concurrence in the filing of this document has been obtained from the individual whose electronic signature is attributed above.

By: /s/ Michael A. Columbo

Michael A. Columbo
Attorney for the Republican National Committee

[PROPOSED] ORDER

The Court, having reviewed the Stipulation to Extend Deadline to Respond to the Motion to Dismiss and Request for Judicial Notice, and good cause appearing, HEREBY ORDERS:

1. Plaintiff is granted a 21-day extension to respond to Defendant's motion to dismiss and request for judicial notice;

2. Plaintiff's responses to Defendant's motion to dismiss and request for judicial notice are due February 27, 2023;

3. Defendant's reply briefs, if any, are due March 9, 2023.

IT IS SO ORDERED.

Dated: _____

By: _____
Troy L. Nunley
United States District Judge

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the above and foregoing has been served upon all counsel of record, via the Court's CM/ECF system on January 30, 2023, as follows:

Michael R. Huston (MHuston@perkinscoie.com)
PERKINS COIE LLP
700 13th St NW
Washington, DC 20005
Telephone: (202) 654-6200

Abdul Kallon (akallon@perkinscoie.com)
Ryan Spear (rspear@perkinscoie.com)
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: (206) 359-8000

Sunita Bali (sbali@perkinscoie.com)
PERKINS COIE LLP
505 Howard Street, Suite 1000
San Francisco, CA 94105
Telephone: (415) 344-7000

Counsel for Defendant Google LLC

By: /s/ Michael A. Columbo

Michael A. Columbo